

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

David L. Crooks,)	
)	
Plaintiff,)	Civil No. 3:11-CV-221 RLM-CAN
)	
v.)	
)	
Household Finance Corporation, III;)	
HSBC Mortgage Services;)	
Julia Blackwell Gelinas;)	
Michele Lorbieski Anderson;)	
Melanie D. Margolin; and)	
Lucy R. Dollens,)	
)	
Defendants.)	

**DEFENDANTS' MOTION TO DISMISS SECOND AMENDED COMPLAINT AND FOR
ENTRY OF FINAL JUDGMENT AND AN AWARD OF SANCTIONS**

Defendants Household Finance Corporation, III, HSBC Mortgage Services, Michele Lorbieski Anderson, Lucy R. Dollens, Julia Blackwell Gelinas, and Melanie D. Margolin (collectively, "Defendants"), by counsel, move to dismiss the Second Amended Complaint filed by Plaintiff David Crooks ("Crooks"), pursuant to Rule 12(b)(1) and the *Rooker-Feldman* doctrine, and enter final judgment and award sanctions against Crooks for filing the Second Amended Complaint, which like his previous attempts at pleading is merely another collateral assault on the state court judgment in the related foreclosure action.

In accordance with Local Rule 7.1, Defendants have filed a supporting brief concurrently with this motion.

Date: December 19, 2011

FROST BROWN TODD LLC

By: /s/ David T. Kasper

David T. Kasper, #10538-49
Attorneys for Defendants Household
Finance Corp, III, HSBC Mortgage
Services, Julia Blackwell Gelinas, Michele
Lorbieski Anderson, Melanie D. Margolin,
and Lucy R. Dollens

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served this 19th day of December, 2011, via United States Mail, first postage prepaid, upon the following:

David L. Crooks, Pro Se
2709 Neff Street
Elkhart, Indiana 46514

I hereby certify that a true and accurate copy of the foregoing was filed electronically this 19th day of December, 2011. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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/s/ David T. Kasper
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